

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
FILE NO. 1:23-CV-366-MR-WCM

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JONATHAN DANIEL WILLIAMS,

Plaintiff,

v.

N. C. DEPARTMENT OF PUBLIC  
SAFETY, N. C. HIGHWAY PATROL,  
*et al.*,

**MOTION FOR  
PROTECTIVE ORDER**

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NOW COME Defendants North Carolina Department of Public Safety, N. C. Highway Patrol, Aaron C. Ammons, Christopher W. Cook, Randy L. Deaton, Brandon S. Smith, and Harold F. Stines, (hereinafter “Defendants”) through counsel, Special Deputy Attorney General Joseph P. Vellon, pursuant to Fed. R. Civ. P. 26(c)(1), requesting that the Court enter a Consent Protective Order controlling the production of confidential documents, material, and information (“Confidential Information”). A copy of the proposed Consent Protective Order is submitted contemporaneously. In support of this motion, Defendants state as follows:

1. Defendants have located documents that are responsive and may be responsive to future discovery requests propounded by Plaintiff to the Defendants.
2. The documents identified and located by the Defendants contain confidential information.
3. In light of the confidentiality of this material, and in an effort to protect that confidentiality, a Consent Protective Order is necessary to authorize the release of the Confidential Information and its handling as well as to ensure that the Confidential Information is not disclosed or used for any purpose except in connection with this litigation.

4. In the interests of justice and to further the legitimate causes of this litigation, the Defendants respectfully request that the Court enter the attached proposed Consent Protective Order in order to permit the disclosure of the confidential information subject to its terms.
5. Undersigned counsel has conferred with *Pro Se* Plaintiff, and he agrees to entry of the Consent Protective Order.

WHEREFORE, the Defendants respectfully request that this Court enter the Consent Protective Order, and grant such and other further relief as the Court deems appropriate.

This the 19th day of February 2025.

**JEFF JACKSON**  
**Attorney General**

/s/ Joseph P. Vellon  
Joseph P. Vellon  
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*Attorney for Defendants*

**CERTIFICATE OF SERVICE**

I, Joseph P. Vellon, hereby certify that on this day, I electronically filed the foregoing **MOTION FOR ENTRY OF CONSENT PROTECTIVE ORDER** with the Clerk of the Court utilizing the CM/ECF system, and on the date below, have caused to be served said document upon the Plaintiff, a non-CM/ECF participant via United States Mail, first-class, postage prepaid addressed as follows:

Jonathan Daniel Williams  
20 Sleepy Hollow Road  
Burnsville, NC 28714  
Courtesy Copy to: jonwilliamslandscapes@gmail.com  
*Pro se plaintiff*

This the 19th day of February 2025.

/s/ Joseph P. Vellon  
Special Deputy Attorney General  
Public Safety Section